

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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UNITED STATES OF AMERICA

v.

BHASKAR SAVANI; ARUN SAVANI;  
NIRANJAN SAVANI; SUNIL PHILLIP; AMEN  
DHYLLON; ALEKSANDRA RADOMIAK; JON  
JULIAN; VIVEK SAVANI; BHARATKUMAR  
PARASANA; HITESHKUMAR GOYANI;  
PIYUSHA PATEL; and SUSAN MALPARTIDA,

Defendants.

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CRIMINAL NO. 2:23-cr-00016-JLS

**DEFENDANT'S UNOPPOSED MOTION TO TEMPORARILY MODIFY CONDITIONS  
OF RELEASE**

Defendant Aleksandra Radomiak, by and through her undersigned counsel, Leigh M. Skipper, respectfully moves this Court to temporarily modify the terms and conditions of her pretrial release for the limited purpose of permitting Ms. Radomiak to travel to Belmar, New Jersey, and Spring Lake, New Jersey, from Friday, June 21, 2024, returning to the Eastern District of Pennsylvania on Monday, June 24, 2024, to attend her nephew's wedding. The assigned Assistant United States Attorney, Meghan Flannery, and the assigned Pre-trial Services Officer, supervisor Michael Baker, who has been closely monitoring Ms. Radomiak, do not oppose the granting of this request. It is understood as a condition that none of the co-defendants in this underlying matter will be in attendance at the events.

In support hereof, it is represented as follows:

1. The wedding will take place on Saturday, June 22, in Belmar, New Jersey, and the reception will be on the same day in Spring Lake, New Jersey. There will be a rehearsal dinner the night before on Friday, June 21, in Belmar, New Jersey, which Ms. Radomiak will also attend. Ms. Radomiak will disclose the location of the rehearsal and rehearsal

dinner, wedding ceremony, and reception to her Pre-trial Services Officer and the assigned Assistant United States Attorney.

2. Ms. Radomiak will be staying at an Airbnb in Belmar, New Jersey, from Friday, June 21, through Monday, June 24, 2024. Ms. Radomiak will disclose the full address of her accommodations to her Pre-trial Services Officer and the assigned Assistant United States Attorney.
3. This is a long-awaited family event for a close family member—indeed, Ms. Radomiak is also her nephew’s Godmother. Many of Ms. Radomiak’s family members—such as Ms. Radomiak’s elderly mother—will be traveling from Poland to attend the wedding.

WHEREFORE, Ms. Radomiak respectfully asks this Court to issue an order in the form of the proposed Order simultaneously submitted with this motion.

DUANE MORRIS LLP

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ALEKSANDRA RADOMIAK

Dated: June 4, 2024